

United States Environmental Protection Agency

Region 1

Statement of Work

**Superfund Technical Assessment & Response Team
(START-2)**

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I. INTRODUCTION

A. ACRONYMS

ACP	Area Contingency Plan
ARARs	Applicable or Relevant and Appropriate Requirements
CAA	Clean Air Act
CERCLA	Comprehensive Environmental Response, Compensation, and Liability Act of 1980
CFR	Code of Federal Regulations
CLP	Contract Laboratory Program
COR	Contracting Officer's Representative
CRP	Community Relations Plan
CSA	Chemical Safety Audit
CWA	Clean Water Act
EE/CA	Engineering Evaluation/Cost Analysis
EPA	Environmental Protection Agency
EPCRA	Emergency Preparedness and Community Right to Know Act
ERNS	Emergency Response Notification System
ESI	Expanded Site Inspection
FEMA	Federal Emergency Management Agency
FOIA	Freedom of Information Act
FRP	Federal Response Plan
GIS	Geographical Information System
HRS	Hazard Ranking System
IA	Integrated Assessment
IRIS	Integrated Risk Information System
JIC	Joint Information Center
MOU	Memorandum of Understanding
NCP	National Oil and Hazardous Substances Pollution Contingency Plan
NPL	National Priorities List
NRT-1	National Response Team Hazardous Materials Emergency Planning Guide, March 1987
NRT-1A	National Response Team Criteria For Review Of Hazardous Materials Emergency Plans, May 1988
OPA	Oil Pollution Act
OSC	On-Scene Coordinator
OSHA	Office of Safety and Health Administration
OSWER	Office of Solid Waste and Emergency Response
POLREP(S)	Pollution Report(s)
PA	Preliminary Assessment
PDD	Presidential Decision Document
PRP	Potentially Responsible Party
QA	Quality Assurance
QC	Quality Control

RCP	Regional Contingency Plan
RCRA	Resource Conservation and Recovery Act
RI	Remedial Investigation
RI/FS	Remedial Investigation/Feasibility Study
RPM	Remedial Project Manager
RRC	Regional Response Center
RRT	Regional Response Team
SARA	Superfund Amendments and Reauthorization Act
SI	Site Inspection
SIP	Site Inspection Prioritization
SPCC	Spill Prevention Controls and Countermeasures
START	Superfund Technical Assessment & Response Team

B. BACKGROUND

Under the authority of the Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA or Superfund) of 1980, as amended, Section 311 of the Clean Water Act (CWA), as amended by the Oil Pollution Act of 1990 (OPA), Subtitle I of the Resource Conservation and Recovery Act (RCRA) and pursuant to the National Oil and Hazardous Substances Pollution Contingency Plan (NCP) and Presidential Decision Document (PDD) #39, the Environmental Protection Agency (EPA) has been delegated the responsibility to undertake response actions with respect to the release or threat of release of oil, petroleum products, hazardous substances, or pollutants and contaminants, that pose an actual or potential threat to human health or welfare, or to the environment. EPA is responsible for conducting evaluations and cleanups of uncontrolled hazardous substance disposal sites and placing those that are considered to pose a significant threat to the public health or the environment on the National Priorities List (NPL).

In addition, EPA has authority under the Emergency Preparedness and Community Right-to-Know Act (EPCRA), the Robert T. Stafford Natural Disaster Act pursuant to the Federal Response Plan (FRP), and other laws, to help address and/or mitigate endangerment of the public health, welfare or environment during emergencies and natural disasters, and to support states and communities in preparing for responses to releases of oil, petroleum products and hazardous substances.

C. PURPOSE

The purpose of this statement of work (SOW) is to provide advisory and assistance services to Federal officials responsible for the activities described in the background.

D. SCOPE

The contracting officer will issue work assignments and task orders for all work required under this SOW in accordance with the terms and conditions of the contract. The contractor shall submit all analyses, options, recommendations, reports, training and seminar materials, and any other work products in draft form for review by the contracting officer or the contracting officer's representative (COR) prior to use or distribution. The Government will make all final regulatory, policy and interpretative decisions resulting from contractor-provided advice and assistance provided under this SOW as well as all final decisions regarding compliance determinations or the existence or violations of an order, law, regulation, etc. The contractor will not provide any legal advice or legal interpretations. When conducting training, seminars and presentations, the contractor shall not interpret EPA policy or regulations and any questions about EPA policy and regulations shall be referred to EPA. The contractor shall not publish or otherwise release, use, or disclose any work product generated under this SOW without obtaining EPA's express written approval. When submitting reports or documents that contain recommendations, the contractor shall:

- ◆ explain or rank policy or action alternatives
- ◆ describe procedures used to arrive at recommendations
- ◆ summarize the substance of deliberations
- ◆ report any dissenting views
- ◆ list sources relied upon
- ◆ detail the methods and considerations upon which the recommendations are based

II. TECHNICAL REQUIREMENTS

Technical requirements under this SOW include assessment; response; preparedness; prevention; enforcement; technical support; data management; and training activities, as discussed below.

A. CERCLA ASSESSMENT ACTIVITIES

The task list below addresses the generic assessment tasks which may be ordered through work assignments and task orders in support of Sections II.A.1. through II.A.11. More specific requirements follow the generic list for:

- ◆ Removal Site Evaluations
- ◆ Preliminary Assessments
- ◆ Site Inspections (SI)
- ◆ Combined Preliminary Assessment/site Inspection
- ◆ Site Inspection Prioritization
- ◆ Integrated Assessments
- ◆ Brownfield Assessments
- ◆ Expanded Site Inspections
- ◆ Remedial Investigation/Feasibility Studies
- ◆ Hazard Ranking System/National Priorities List Packages
- ◆ Enforcement Support

Assessment Task List

More specifically, the contractor shall:

1. locate and review files of waste generator(s)/site owner(s)/site operator(s) and other documents relating to past operator(s), (for example, deeds, court transcripts);
2. locate and review files of state and local authorities, other federal agencies, and interested parties;
3. using COR-approved protocols, interview site owner(s)/operator(s), state/local officials, residents, and other interested parties;
4. provide a written record of Potentially Responsible Party (PRP) identification efforts to assist EPA in determining cost liability;
5. conduct off-site perimeter visual observation of the site;

6. obtain site access documentation from affected parties utilizing region specific protocols;
7. using COR-approved protocols, conduct a site visit to identify all potential hazards; document site conditions with written and visual documentation (for example., 35mm camera and/or [VCR] or 8 mm video camcorder, sketches, logbook description, or digital camera);
8. provide recommendations and options regarding:
 - ◆ whether an immediate threat to public health or the environment exists
 - ◆ potential need for a removal action
 - ◆ further investigation
 - ◆ no further action
 - ◆ state referral
 - ◆ referral to other federal agencies
 - ◆ referral to other EPA programs
 - ◆ facility actions
 - ◆ other actions;
9. identify site characteristics (for example, populations, sensitive environments, site usage, hydro geological and meteorological conditions, and other pertinent site conditions);
10. identify pollutant dispersal pathways;
11. identify extent of contamination (for example, soil, water, air, groundwater, sediments and lagoon sludge);
12. develop a health and safety plan for field activities which complies with Office of Safety and Health Administration (OSHA) and local health and safety requirements;
13. develop and submit a site sampling and Quality Assurance (QA) plan for field activities to ensure the usability of the data for assessment purposes;
14. conduct both on-site and/or off-site environmental sampling activities;
15. provide analytical services to include:
 - ◆ Contract Laboratory Program (CLP) (via sample coordinator)
 - ◆ non-CLP (including EPA regional laboratory and regional analytical services contracts),
 - ◆ field screening,
 - ◆ mobile laboratories;
16. identify and address data gaps required to meet EPA assessment objectives (for example, background levels, applicable or relevant and appropriate requirements (ARARs), groundwater information);
17. install monitoring wells and/or piezometer;
18. perform air monitoring;
19. perform analytical data validation;
20. conduct geophysical surveys/investigations;
21. generate preliminary HRS score;
22. analyze site risks regarding whether site contaminants pose a current or potential risk to human health and the environment in the absence of any response action to include:
 - ◆ contaminant identification
 - ◆ exposure assessment
 - ◆ toxicity assessment

◆ risk characterization

- ◆ provide information necessary to determine whether or not a response is necessary at the site, provide justification for any response action proposed, and explain what exposure pathways need to be addressed;
- 23. provide a hazard ranking system screening in accordance with EPA OSWER Directive 9345.1-07 (November 1992), “The Hazard Ranking System (HRS) Guidance Manual” using the PREScore software;
- 24. report the draft score to the EPA COR prior to proceeding with the formal HRS package;
- 25. prepare a draft HRS package to include:
 - ◆ site summary
 - ◆ PREScore HRS score sheets
 - ◆ documentation record
 - ◆ figures
 - ◆ maps
 - ◆ references;
- 26. dispose of investigation derived wastes, in accordance with EPA guidance (Managing Investigation Derived Wastes for Site Inspections - Office of Solid Waste and Emergency Response [OSWER] Directive 9345.3-02);
- 27. provide cost analysis/information for response alternatives;
- 28. provide site security to prevent unauthorized access of any persons or animals to preserve public safety. Site security may include, for example, fencing, or armed or unarmed security services;
- 29. identify contamination or potential contamination associated with illegal drug labs, explosions, or spills;
- 30. complete and maintain documentation of all contractor actions taken or assigned consistent with the NCP for cost recovery purposes. Make available to federal trustees of affected natural resources information and documentation to assist the trustees in the determination of actual or potential natural resource injuries. Documentation shall provide:
 - ◆ the source and circumstances of the release
 - ◆ the identity of responsible parties
 - ◆ the response action taken
 - ◆ an accounting of contractor costs incurred in support of EPA response actions
 - ◆ the impacts and potential impacts to the public health and welfare and the environment;
- 31. locate and review existing site, facility and/or release data;
- 32. identify potentially responsible parties (PRP)(s);
- 33. analyze PRP documents and actions for compliance with enforcement actions;
- 34. analyze the accuracy, timeliness and completeness of PRP reports;
- 35. document PRP activities and provide negotiation support;
- 36. provide health indication sampling and analysis, for example blood, urine, and hair samples;
- 37. provide site communications (for example, radios, repeaters, commercially available radio systems, telephones, pagers);
- 38. perform nuclear/biological/chemical sampling and analysis;
- 39. conduct human indicator sampling;
- 40. assist in search and rescue efforts;
- 41. provide engineering design products and services.

1. Removal Site Evaluations

The contractor-produced site evaluations and preliminary assessment reports provide the COR with technical, human and environmental threat information necessary for the COR's determination of the need for removal or other response actions. Sections 300.410 and 300.305 of the NCP include the removal site evaluation and preliminary assessment requirements. The contractor shall perform removal site evaluations in conformance with the following:

EPA OSWER Directive 9360.3-08, "Superfund Removal Procedures/
The Removal Response Decision: Site Discovery to Response Decision"; and

Region specific guidance, available in Region's library.

More specifically, the contractor shall collect and document technical information for oil spill discharges or threats thereof, and hazardous substance or pollutant/contaminant releases, or threats thereof. For example:

- ◆ site characterizations
- ◆ magnitude of the incident
- ◆ extent of contamination
- ◆ migration pathways
- ◆ weather conditions impacting site
- ◆ potentially affected populations

2. Preliminary Assessments (PA)

The contractor shall perform PA activities, in conformance with:

OSWER Directive 9345.0-01A, "Guidance for Performing Preliminary
Assessments Under CERCLA", dated September 1991; and,

Region-specific requirements, available in Region's library.

More specifically, the contractor shall:

- a. review past and present facility waste handling practices and permit history
- b. document the presence, quantity, type, or absence of uncontained or uncontrolled hazardous substances on site, and releases to the environment
- c. identify pollution dispersal pathways; determine pathway-specific receptors and surrounding population density
- d. locate other environmentally sensitive receptors (for example, wetlands and endangered species)

3. Site Inspections

The purpose of the SI is to incorporate and build upon the objectives of a PA, and may require the collection of samples or the evaluation of existing analytical data to evaluate site conditions. The contractor shall perform SI activities in conformance with:

EPA/540-R-92-021, "Guidance for Performing Site Inspections Under CERCLA", dated September 1992; and,

Region specific requirements, available in Region's library.

More specifically the contractor shall:

- a. identify releases that pose no significant threat to public health or the environment
- b. analyze the potential need for removal action
- c. collect or develop data for the COR to evaluate the release pursuant to the HRS
- d. collect data required for the COR to better characterize the release for more effective and rapid initiation of the remedial investigation/feasibility Study (RI/FS) or response

4. Combined PA/SI

As ordered, the contractor shall perform preliminary search and field activities outlined in the PA and SI sections above into one effort.

5. Site Inspection Prioritization (SIP)

The purpose of the SIP -- an intermediate step in the site assessment program to update old SIs (for example, SIs completed prior to the revision to the HRS) on a discrete universe of sites-- is to gather any additional information necessary to help set priorities among sites assessed under the old HRS scoring system. The contractor shall perform SIP activities in accordance with:

OSWER Directive 9345.1-15FS " Site Inspection Prioritization Guidance" (August 1993), as amended, and

Region-specific requirements, available in the Region's library

More specifically, the contractor shall:

For a Level A SIP:

- a. update or revise the HRS Score
- b. identify data gaps
- c. recommend additional data collection activities

For a Level B SIP:

- a. update or revise the HRS Score
- b. perform desktop data collection to support the revised score

For a Level C SIP:

- a. update or revise the HRS Score
- b. identify data gaps
- c. perform desktop data collection to support the revised score
- d. perform sampling (data collection)

6. Integrated Assessments (IA)

The purpose of an IA is to gather data that meets the requirements of both a removal site evaluation and remedial site inspection at the same site. The data gathering effort may require field screening and full CLP analysis of samples. The contractor shall perform the relevant tasks described in the Assessment Task List in conformance with the following:

“Integrating Removal and Remedial Site Assessment Investigations”, OSWER Short Sheet 9345.16FS, September 1993;

Removal Site Evaluation and Site Inspection documents referenced above; and

Region specific guidance, available in the regional library

7. Brownfield Assessments (BA)

The Brownfields are abandoned, idled or underutilized industrial and commercial facilities. The purpose of the Brownfield assessment is to streamline site investigation and to characterize site conditions. The BA will not involve collection of data associated with HRS package preparation. The objectives of a BA are to identify:

- ◆ the nature and extent of contamination on-site
- ◆ the risks posed by the contamination
- ◆ potential alternatives for cleanup
- ◆ costs of cleanup options for site redevelopment

The contractor shall perform BAs in conformance with the following:

“Integrating Brownfields and Traditional Site Assessment”, #9230.0-81, EPA 540-F-96-028, January 1997;

“Guidance for Performing Site Inspections Under CERCLA”
EPA 540-R-92-021, September 1992;

“Road Map to Understanding Innovative Technology Options for Brownfields Investigation and Cleanup”, EPA 542-B-97-002;

Region specific requirements, available in Region's library;
Brownfields Quality Assurance document (EPA 540-R-98-038);

“Standard Practice for Environmental Site Assessments: Phase I Environmental Site Assessment Process”, ASTM, E 1527-94; and

“Environmental Site Assessments: Phase II Environmental Site Assessment Process, ASTM”, E 1903-97

8. Expanded Site Inspections (ESI)

The purpose of the Expanded Site Inspections (ESI) is to provide the additional information required to support preparation of an HRS package for NPL listing. The contractor shall perform the relevant tasks for an ESI as described in the Assessment Task List in conformance with the following:

EPA 540-R-92-021, “Guidance for Performing Site Inspections Under CERCLA”, dated September 1992; and

Region-specific requirements, available in Region's library

9. Remedial Investigation/Feasibility Study (RI/FS)

An RI/FS is an extensive assessment conducted at sites which are proposed/added to the NPL. The purpose of an RI/FS is to develop the data necessary to support the selection of a remedy to eliminate, reduce, or control risks to human health and the environment. The contractor shall perform the relevant RI/FS tasks described in the Assessment Task List in conformance with the following:

“EPA Guidance for Conducting Remedial Investigations and Feasibility Studies Under CERCLA, Interim Final”, U.S. EPA, Office of Emergency and Remedial Response, October 1988, OSWER Directive No. 9355.3-01.

10. Hazard Ranking System/National Priorities List Packages (HRS/NPL)

The contractor shall perform the relevant HRS/NPL tasks described in the Assessment Task List in conformance with the following:

EPA OSWER Directive 9345.1-07, November 1992, "The Hazard Ranking System Guidance Manual"

11. Enforcement Support

The contractor shall perform the relevant enforcement support activities described in the Assessment Task List.

B. RESPONSE ACTIVITIES

The task list below addresses the generic response tasks which may be ordered through work assignments and task orders in support of Sections II.B.1. through II.B.9. More specific requirements follow the generic list for:

- ◆ Emergency Response
- ◆ Oil Spill Response
- ◆ Minor Containment
- ◆ Fund-lead Removal Actions
- ◆ Potentially Responsible Parties Removal Actions
- ◆ Counter Terrorism Response
- ◆ Federal Disaster Response
- ◆ Regional Response Center Support
- ◆ Enforcement Support

Response Task List

More specifically, the contractor shall:

1. collect facts regarding the discharge or release, to include its source and cause
2. identify potentially responsible parties
3. analyze the nature, amount, and location of discharged or released materials
4. analyze the probable direction and time of travel of discharged or released materials
5. analyze whether the discharge is a worst case discharge in accordance with Sec. 300.324 of the NCP
6. identify the pathways to human and environmental exposure
7. analyze the potential impact on human health, welfare and safety, and the environment posed by the release of hazardous substances, contaminants or pollutants, and discharge of oil
8. provide analysis of discharges or releases posing a substantial threat to the public health or welfare of the United States
9. analyze the potential impact on natural resources and property
10. document costs incurred by the contractor for the response actions
11. collect or review data such as site management practices, information from generators, photographs, historical photographic analyses, literature searches, and personal interviews
12. identify active or historical facility processes or operations that may contribute to the release or threat of release of hazardous substances, pollutants, contaminants, or discharge of oil
13. develop options to abate, prevent, minimize, stabilize, mitigate, eliminate or remove the threat of a release to public health or welfare or the environment

14. prepare a sampling plan which describes the number, type, and location of samples and the type of analyses (for example, sampling and analysis plans for collection of multi-media environmental samples; chemical product or waste; oil or other materials)
15. observe and document federal, state, and private actions taken to conduct a response action
16. recommend options for the use of special teams and other assistance described in Section 300.145 of the NCP
17. disseminate EPA-approved information to the public
18. collect, analyze and validate data in accordance with EPA standard methods for sample analysis
19. develop site specific Health and Safety Plans (HSPs),
20. develop health and safety procedures for response activities, such as OSHA levels of protection associated with a site
21. monitor and measure COR-identified chemicals and analyze potential exposure conditions
22. recommend waste disposal options
23. review completeness of disposal documentation, such as manifests, waste profile data and other information
24. obtain permits from federal, state or local agencies, associated with the contractor's response activities
25. provide expert testimony
26. provide site security to prevent unauthorized access of any persons or animals to preserve public safety, such as fencing, or armed or unarmed security services
27. input contractor's costs using the EPA cost tracking software, Removal Cost Management System (RCMS)
28. conduct file reviews (for example, federal, state and local agency records) to obtain background information to analyze releases of hazardous substances, pollutants, contaminants or oil
29. analyze PRP response documents and actions
30. analyze the accuracy, timeliness and completeness of PRP reports
31. document PRP activities and provide negotiation support
32. verify PRP compliance with enforcement orders
33. identify local and elected officials
34. conduct deed and title searches
35. conduct waste profile analyses

1. Emergency Response

The contractor shall perform the response tasks listed above to provide technical advice, findings, facts, recommendations and options to the EPA COR. The contractor shall maintain a 24-hour, seven day a week response capability to respond to discharges/releases or threatened discharges/releases as defined in Subparts D and E of the NCP. Response times required will be determined by the COR and will vary on a case by case basis. The required response time will be determined at the time a verbal assignment is issued.

2. Oil Spill Response

The contractor shall perform the tasks listed in the Response Task List during an oil spill response.

3. Minor Containment

These actions are short in duration (generally not exceeding ****40**** hours per assignment) and provide temporary stabilization prior to the mobilization of other responders.

The contractor shall contain and stabilize minor releases of oil or hazardous substances, such as leaking containers (55 gallon drums, barrels, and smaller containers); oil discharged to waterways; or, spills to soil.

4. Fund-lead Removal Actions

The contractor shall perform the tasks listed in the Response Task List during Fund-lead removal actions.

5. Potentially Responsible Parties Removal Actions

The contractor shall perform the tasks listed in the Response Task List during Potentially Responsible Parties removal actions.

6. Counter Terrorism

The contractor shall perform the tasks listed in the Response Task List during Counter-terrorism removal actions.

7. Federal Disaster Response

The contractor shall perform the tasks listed in the Response Task List during Federal Disaster Response removal actions.

8. Regional Response Center Support

The contractor shall provide support to the Regional Response Center (RRC) and the Emergency Response Notification System (ERNS) during major spills, or releases, periods of multiple emergencies within the Region, disasters and terrorist acts. This includes support for Emergency Operation Centers and Joint Operation Centers under the FRP and National Contingency Plan.

More specifically, the contractor shall:

- a. collect and compile data from spill reports, pollution reports (POLREPS) and spill notification phone lines
- b. provide COR-approved information to the state, local or natural resource trustee agencies
- c. input data from spill reports
- d. provide information to COR:
 - ◆ for (Freedom of Information Act) FOIA request responses
 - ◆ to evaluate facilities' release history for the ERNS

9. Enforcement Support

The contractor shall perform the relevant enforcement support activities described in the Response Activities Task List.

C. PREPAREDNESS AND PREVENTION ACTIVITIES

Preparedness and prevention activities involve special preparedness issues and responsibilities such as counter-terrorism, regulatory responsibilities such as spill prevention control and counter measures and facility response plans and contingency planning such as area plans and Regional Contingency Plans and Regional Response Team support to the OSC.

The contractor shall provide support in connection with audits or inspections to identify and document violations of environmental laws as prescribed by the General Duty clause in Section 112R of the Clean Air Act (CAA), Title III, Section 1.

The task list below addresses the generic tasks which may be ordered through work assignments or task orders. More specific requirements follow the generic list for:

- ◆ Counter Terrorism/Domestic Preparedness and Prevention
- ◆ Chemical Emergency Preparedness and Prevention
- ◆ Contingency Plans
- ◆ Chemical Safety Audits
- ◆ Accident Investigations
- ◆ Spill Prevention Controls and Countermeasures/Facility Response Plan Reviews and Inspections

- ◆ Oil Program Activities
- ◆ Risk Management Planning/General Duty Inspections

1. Counter Terrorism/Domestic Preparedness and Prevention

The contractor shall perform the following tasks to increase awareness and preparedness among responders at the Federal, state, and local levels of the potential threat posed by nuclear, biological, incendiary, chemical and explosive terrorism and to develop programs and procedures to prevent and prepare for deliberate releases resulting from terrorist incidents in accordance with the following guidance documents:

- ◆ Presidential Decision Directives #39, #62, #63, and #67
- ◆ U.S. Policy on Counter-terrorism, dated June 21, 1995, (<http://www.ciao.gov/resources.html>)
- ◆ Title XIV of Public Law 104-201, The Defense Against Weapons of Mass Destruction Act, also known as Nunn-Lugar-Domenici
- ◆ Other programs, such as the NCP and the FRP;
- ◆ “EPA’s Role in Counter-Terrorism Activities”, EPA 550-F-98-014, February 1998, (<http://www.epa.gov/swercepp/factsheets/ct-fctsh.pdf>).

More specifically, the contractor shall:

- a. support state and local responders in planning for emergencies associated with weapons of mass destruction
- b. provide logistical support for key federal partners during meetings and/or training exercises
- c. research and analyze state-of-the-art response technology for application and utilization in a potential or actual terrorist threat or act
- d. conduct counter-terrorism preparedness simulation drills and document lessons learned
- e. identify existing preparedness and emergency response management systems and capabilities at the federal, regional, state, tribal, and local levels and offer options for utilization

2. Chemical Emergency Preparedness and Prevention

The contractor shall:

- a. review compliance of federal, state and local contingency and response plans prepared under the CAA, EPCRA, CERCLA, OPA, FRP and NCP with the requirements described in National Response Team Criteria For Review Of Hazardous Materials Emergency Plans, May 1988 (NRT-1A) www.nrt.org and in integrated contingency plan guidelines available from the regional office
- b. analyze ERNS data and provide support in conducting EPCRA inspections for use in EPCRA enforcement case support
- c. provide logistical support for local, regional, national and international preparedness planning. For example:
 - ◆ coordinate National Response System activities including drills which may involve

government/private parties and U.S./Mexico and U.S./Canada border cities (if appropriate and authorized)

- ◆ generate Geographical Information System (GIS) documentation
- ◆ generate bilingual documentation
- ◆ provide translation services
- ◆ conduct outreach activities for regulated facilities, federal, state, tribal and local agencies, and the public about the requirements associated with Chemical Emergency Preparedness and Prevention program

3. Contingency Plan

There are several types of contingency plans. The primary contingency plans are: the National Contingency Plan (NCP), which includes the FRP and Federal Radiological Emergency Response Plans (FREPs); Regional Contingency Plans (RCPs); and the Area Contingency Plans (ACPs). These plans are available for inspection at EPA regional offices.

The contractor shall:

- a. draft updates to the RCPs in accordance with 40 CFR 300(the NCP)
- b. develop contingency plan exercises
- c. draft revisions to ACPs and sub-area plans, incorporating comments and Area Committee changes into the plans
- d. compile a list of response resources
- e. survey, compile and validate economically and environmentally sensitive area location information in accordance with COR provided criteria.
- f. identify and analyze plans for the use of alternative technologies
- g. design and analyze contingency plan drills and exercises using the National Strike force Coordinating Center Pollution Response Emergency Preparedness Guidelines
- h. provide threat assessment, hazard, risk, and vulnerability analyses for spills into the environment
- i. perform plume modeling for chemical releases into water and air
- j. provide technical and logistical support to state or local response organizations in the development of site specific contingency plans

4. Chemical Safety Audits

Chemical Safety Audit (CSA) program information is available in EPA Publication 550-F-93-005, March 1993, *CHEMICAL SAFETY AUDIT PROGRAM - Fact sheet* (<http://www.epa.gov/swercepp/factsheets/csa.txt>).

Using COR-approved protocols, the contractor shall:

- a. provide safety plans for site visits
- b. interview facility personnel regarding background information, facility processes and

- standard operating procedures
- c. review and document observations and conclusions of on-site facility operations to include:
- ◆ employee awareness of chemical and process hazards
 - ◆ process characteristics
 - ◆ emergency planning and preparedness
 - ◆ hazard evaluation and release detection techniques
 - ◆ operations and emergency response training
 - ◆ facility/corporate management structure
 - ◆ preventive maintenance and inspection programs
 - ◆ community notification mechanisms and techniques

5. Accident Investigations

A major chemical accident is one which:

- ◆ results in one or more human fatalities;
- ◆ results in the hospitalization of three or more workers or members of the public;
- ◆ causes property damage on or off the facility initially estimated at \$500,000. or more in total;
- ◆ presents a serious threat to worker health or safety, public health, property, or the environment;
- ◆ has significant off-site consequences, such as large-scale evacuations or protection-in-place actions, closing of major transportation routes, substantial environmental contamination or substantial effects on wildlife or domesticated animals (for example, injury or death); or
- ◆ becomes an event of significant public concern.

The following tasks shall be conducted in accordance with the MOU between EPA and OSHA at (<http://www.epa.gov/swercepp/pubs/oshaimou.html>). Using COR-approved protocols, the contractor shall:

- a. provide safety plans for site visits for the purpose of conducting accident investigations
- b. investigate and compile information on major chemical accidents to include:
- ◆ provide information to document violations of law(s) and recommend actions to correct the violations
 - ◆ examine facility records
 - ◆ analyze equipment design, drawings, specifications and records
 - ◆ record and analyze the engineering basis for chemical process safety systems
 - ◆ document evidence of the cause(s)
 - ◆ assess safety and accident prevention systems
 - ◆ record the equipment involved in the accident
 - ◆ provide options for corrective measures
- c. write accident investigation reports to include:
- ◆ a description of the accident

- ◆ a description of the response to the accident
- ◆ further planned activities
- ◆ laboratory test results
- ◆ discussion of the probable root cause(s) of and contributing factors to the accident
- ◆ observations and findings
- ◆ recommendations for enhancing chemical safety, emergency preparedness, and prevention of chemical accidents, both facility-specific and industry-wide.

6. Spill Prevention Controls and Countermeasure/Facility Response Plan Reviews and Inspections

Using COR-approved protocols, the contractor shall:

- a. review SPCC plans and Facility Response Plans to analyze and document compliance issues with EPA Oil Pollution Prevention Regulations (<http://www.law.cornell.edu/cfr/40p112htm#40p112s7>)
- b. conduct on-site facility surveys and SPCC/Facility Response Plans compliance inspections
- c. document observations and conclusions of each facility inspection/survey performed, and complete data forms
- d. prepare draft notices to facilities of compliance, non-compliance, or violations
- e. provide enforcement support

7. Oil Program Activities

The contractor shall perform the oil program activities set forth below in accordance with: Section 311(j)(5) of the CWA and Section 2101 of title 46, U.S. Code.

Using COR-approved protocols, the contractor shall:

- a. Identify a tank vessel or an onshore facility that, because of its location, could reasonably be expected to cause substantial harm to the environment by discharging into or on the navigable waters and/or adjoining shorelines.
- b. conduct seminars/give presentations to community groups and industry on the impact of the Oil Pollution Act and related subjects
- c. coordinate and participate in drills and simulations at oil storage facilities

8. Risk Management Planning/General Duty Inspections

The contractor shall perform the following tasks in accordance with the guidelines for the Risk Management Program/General Duty Inspection activities required under Section 112(r) of the CAA Amendments of 1990 and 40 CFR Part 68. General information related to Section 112(r) can be found at (<http://www.epa.gov/swercepp/pubs/caa-faqs.html>).

More specifically, the contractor shall:

- a. Provide technical information directed at the regulated community to regulated facilities, federal, state, tribal and local agencies, and the public
- b. Analyze Risk Management Plans (RMPs)/General Duty Inspections to identify internal inconsistencies in data submitted, potential problems based on facility accident histories, and unusual data (e.g., failure to list appropriate hazards under the prevention program)
- c. Complete a COR-provided audit checklist summary and provide a draft report, referencing violations in regard to the CAA Section 112(r) and 40 CFR Part 68 and options for corrective actions at the facility. EPA will make all determinations regarding violations and corrective actions.
- d. Conduct RMP/General Duty field inspections to include an on-site analysis and documentation of: processes and storage areas; employee interviews; manager and supervisor interviews; training and maintenance records; operating procedures of engineering processes and release prevention measures and hazards

D. REGIONAL RESPONSE TEAM SUPPORT

The Regional Response Team (RRT) is comprised of federal and state entities as well as representatives of the response community, local governmental agencies and interested members of the general public.

The contractor shall:

1. analyze and document the extent of an incident, the potential hazards, type of resources needed and the actions of the Responsible Party(ies) to respond
2. draft POLREPS, and lessons learned reports
3. design, develop, prepare, analyze and report observations of planning, training and drills/exercises to provide options for preparedness and operational readiness of the RRT and the response community within the region
4. analyze responses to discharges of oil and releases of hazardous substances, pollutants or contaminants; assess equipment availability; readiness and coordination among RRT member agencies; other public and private agencies
5. document and analyze plans and planning efforts for the Regional Contingency Plan, Area Plans and special subject plans to include but not limited to:
 - ◆ the Emergency Support Function # 10
 - ◆ Hazardous Materials to the FRP
 - ◆ the Federal Radiological Emergency Response Plan
 - ◆ Counter-terrorism plans
 - ◆ use of chemical counter-measures in spill response
6. provide logistical support for scheduled RRT meetings to include, but not limited to:
 - ◆ select and reserve meeting space
 - ◆ arrange site tours and meetings
 - ◆ develop visual aids to include computer driven presentations
 - ◆ document technical meeting minutes

- ◆ provide a technical summary of the meeting
- ◆ attend scheduled RRT meetings
- 7. develop and update the RRT mailing list, an RRT e-mail list, and an e-mail group distribution capability to send EPA-authorized notices

E. TECHNICAL SUPPORT ACTIVITIES

The list below addresses the technical support activities which may be ordered through work assignments or task orders. More specific requirements follow the generic list.

The contractor shall provide information, analyses, options and recommendations for implementing emerging technologies and maintaining program currency.

- ◆ General Technical Support
- ◆ Multi-media Surveys and Inspections
- ◆ Treatability Studies
- ◆ Engineering Evaluations and Cost Analyses
- ◆ Continuous Releases
- ◆ Public Participation Support
- ◆ Site Discovery Programs
- ◆ Environmental/ Ecological Evaluations
- ◆ Assessment of Human Health and Ecological Risks
- ◆ Administrative Record Support

1. General Technical Support

- a. identify, analyze and recommend for implementation emerging technologies
- b. provide information, analysis, recommendations and options for maintaining program currency and program improvements.

2. Multi-media Surveys and Inspections

- a. accompany the COR during on-site facility surveys and inspections at sites, facilities or releases where hazardous waste contaminants or pollutants are managed, treated, stored or disposed
- b. using COR-approved protocols, record and document compliance with applicable or relevant and appropriate federal and state requirements related to environmental statutes such as the Resource Conservation and Recovery Act or the Clean Water Act (CWA)
- c. compile multi-media checklists to be used at sites, facilities or releases

3. Treatability Studies

Treatability studies are conducted to:

- ◆ obtain data to develop and evaluate treatment alternatives
- ◆ support the design of selected response alternatives
- ◆ reduce cost and performance uncertainties for treatment alternatives

The contractor shall perform treatability studies in conformance with the following:

“Guide for Conducting Treatability Studies Under CERCLA”, EPA/540/R-92/071A; and

OSWER DIRECTIVE-9380.3-10, NTIS Order Number: PB93-126787INX

4. Engineering Evaluations and Cost Analyses

The contractor shall conduct EE/CAs tasks in conformance with:

“Guidance on Conducting Non-Time Critical Removal Actions Under CERCLA” (8/93), EPA 540-R-93-057.

The contractor shall conduct engineering evaluations and cost analyses (EE/CAs) to include:

- ◆ site characterizations
- ◆ addressing removal action objectives and identification of alternatives
- ◆ identification of ARARs
- ◆ analysis and comparison of removal action options for cost effectiveness and implementability

5. Continuous Releases

Using COR-approved protocols, the contractor shall monitor the reporting of continuous releases as defined in CERCLA Section 103, and EPCRA. General information may be found at:

(<http://www.epa.gov/oerrpage/superfnd/web/resources/release/faciliti.html>).

More specifically, the contractor shall:

- a. analyze facility reports
- b. develop summary reports of evaluated facilities
- c. perform facility inspections to verify accuracy of facility evaluation reports

6. Public Participation Support

The contractor shall perform public participation tasks to ensure that public and private interests are kept informed of response events and activities and that all parties' concerns are considered throughout the process.

The contractor shall perform public participation tasks in conformance with:

“Community Relations in Superfund: A Handbook”, January 1992; and

"Public Participation Guidance for On-Scene Coordinators: Community Relations and the Administrative Record", OSWER Directive 9360-05, June 1992

7. Site Discovery Programs

The contractor shall perform the following tasks to in order for EPA to determine whether sites require additional site assessment activities. The contractor shall: collect, record, and analyze information on location and type of uncontrolled hazardous substance disposal sites, facilities and/or releases to isolate potential candidates for further site assessment.

8. Environmental/Ecological Evaluations

The contractor shall coordinate activities with the trustees at a site as defined by Section 104(b) (2) of CERCLA and the NCP to ensure an adequate technical basis for a settlement agreement. EPA will determine the adequacy of any settlement agreement. The contractor shall perform Environmental/Ecological Evaluations in accordance with the following guidance:

U.S. Department of Commerce, National Oceanic and Atmospheric Administration (NOAA), 1996. Natural Resource Damage Assessment Guidance Document: Injury Assessment (Oil Pollution Act of 1990). National Oceanic and Atmospheric Administration, Damage Assessment and Restoration Program, Silver Spring, MD. Available for a fee from the National Technical Information Services (NTIS), 5285 Port Royal Road, Springfield, VA 22161; telephone: (703) 487-4650. NTIS accession number: PB 96-199427;

NOAA, 1996. Natural Resource Damage Assessment Guidance Document: Specifications for Use of NRDAM/CME Version 2.4 to Generate Compensation Formula (Oil Pollution Act of

199). National Oceanic and Atmospheric Administration, Damage Assessment and Restoration Program, Silver Spring, MD. Available for a fee from the National Technical Information Services (NTIS), 5285 Port Royal Road, Springfield, VA 22161; telephone: (703) 487-4650. NTIS accession number: PB 96-199435;

U.S. Department of the Interior (DOI). 1996. The CERCLA Type A Natural Resource Damage Assessment Model for the Great Lakes Environments (NRDA/GLE). U.S. Department of the Interior, Office of Environmental Policy and Compliance, Washington, D.C., Vol I-III. Available for a fee from the National Technical Information Services (NTIS), 5285 Port Royal Road, Springfield, VA 22161; telephone: (703) 487-4650. NTIS accession number: PB 96-501770 (4/96). Computer diskettes containing the version 1.2 natural resources damage assessments models can be obtained from the Department of the Interior. (The version 1.31 computer model is available in draft status.);

DOI. 1996. The CERCLA Type A Natural Resource Damage Assessment Model for Coastal and Marine Environments (NRDA/CME). U.S. Department of the Interior, Office of Environmental Policy and Compliance, Washington, D.C., Vol I-VI. Available for a fee from the National Technical Information Services (NTIS), 5285 Port Royal Road, Springfield, VA 22161; telephone: (703) 487-4650. NTIS accession number: PB 96-501788 (4/96). Computer diskettes containing the version 1.2 natural resources damage assessments models can be obtained from the Department of the Interior. (The version 2.2 computer model is available in draft status.);

DOI. 1987. Type B Technical Information Document: Application of Air Models to Natural Resource Injury Assessment. Available for a fee from the National Technical Information Services (NTIS), 5285 Port Royal Road, Springfield, VA 22161; telephone: (703) 487-4650. NTIS accession number: PB 88-100128 (6/87);

DOI. 1987. Type B Technical Information Document: Approaches to the Assessment of Injury to Soils Arising from Discharges of Hazardous Substances and Oil. Available for a fee from the National Technical Information Services (NTIS), 5285 Port Royal Road, Springfield, VA 22161; telephone: (703) 487-4650. NTIS accession number: PB 88-100144 (6/87);

DOI. 1987. Type B Technical Information Document: Injury to Fish and Wildlife Species. Available for a fee from the National Technical Information Services (NTIS), 5285 Port Royal Road, Springfield, VA 22161; telephone: (703) 487-4650. NTIS accession number: PB 88-100169 (6/87);

DOI. 1987. Type B Technical Information Document: Guidance on Use of Habitat Evaluation Procedures and Habitat Suitability Index Models for CERCLA Applications. Available for a fee from the National Technical Information Services (NTIS), 5285 Port Royal Road, Springfield, VA 22161; telephone: (703) 487-4650. NTIS accession number: PB 88-100136 (6/87);

American Petroleum Institute (API). Measuring Natural Resource Damages: An Economic Appraisal. API Publication No. 4490. Washington, D.C., 1989;

Kopp, Raymond J. and V Kerry Smith (eds.). Valuing Natural Assets and the Economics of Natural Resource Damage Assessment. Resources for the Future, Washington, D.C., 1993.

9. Human Health/Ecological Risk Assessment

The contractor shall perform the risk assessments in accordance with the following guidance:

For Baseline Human Health Risk Assessments:

Risk Assessment Guidance for Superfund (RAGS), Volume I: Human Health Evaluation Manual: Part A, Baseline Risk Assessment. Interim Final. December 1989. EPA 540/1-89/002. NTIS PB90-155581.

Part B, Development of Risk-Based Preliminary Remediation Goals. December, 1991. EPA 540/R-92/003. OSWER Directive 9285.7-01B. NTIS PB92-963333.

Part C, Risk Evaluation of Remedial Alternatives. December 1991. EPA/540/R-92/004. OSWER Directive 9285.7-01C. NTIS PB92-963334.

Part D, Standardized Planning, Reporting and Review of Superfund Risk Assessments. January 1998. EPA 540-R-97-033. OSWER Directive 9285.7-01D. NTIS PB97-963305;

Supplemental Guidance to RAGS: Calculating the Concentration Term. June 22, 1992. OSWER Directive 9285.7-08I;

Standard Default Exposure Factors. Interim Final. OSWER Directive 9285.6-03. March 25, 1991;

Final Guidance Data Useability in Risk Assessment (Part A). April 1992. OSWER Directive 9285.7-09A. NTIS PB92-963356;

Guidance for Data Useability in Risk Assessment (Part B). May 1992. OSWER Directive 9285.7-09B. NTIS PB92-963362;

Dermal Exposure Assessment: Principles and Applications. January 1992. EPA 600/8-91/011B;

Exposure Factors Handbook, Volume 1. 1997. EPA/600/P-95/002Fa;

Exposure Factors Handbook, Volume 2. 1997. EPA/600/P-95/002Fb;

Exposure Factors Handbook, Volume 2. 1997. EPA/600/P-95/002Fc;

Air/Superfund National Technical Guidance Study Series, Volumes I, II, III, and IV (EPA 450/1-89-001,002,003,004, July 1989);

Final Soil Screening Guidance, May 17, 1996. Soil Screening Guidance User's Guide. Office of Solid Waste and Emergency Response. EPA/540/R-96/018;

Soil Screening Guidance: Technical Background Document. EPA 540/R-94/126;

EPA Risk Characterization Program. Memorandum from Administrator Carol Browner. Office of the Administrator, Washington, DC. March 21, 1995;

Provisional Guidance for Quantitative Risk Assessment of Polycyclic Aromatic Hydrocarbons. Office of Research and Development, Washington, DC. EPA/600/R-93/C89;

PCBs: Cancer Dose-Response Assessment and Application to Environmental Mixtures. Office of Research and Development, Washington, DC. EPA/600/P-96/001A;

Revised Interim Soil Lead Guidance for CERCLA Sites and RCRA Corrective Action Facilities. July 14, 1994. OSWER Directive 9355.4-12.

For Baseline Ecological Risk Assessments:

Guidelines for Ecological Risk Assessment, Final. April 1998. EPA/630/R-95-002F;

Ecological Risk Assessment Guidance for Superfund, Process for Designing and Conducting Ecological Risk Assessments. June 1997. EPA/540-R-97-006;

Ecological Assessment of Hazardous Waste Sites: A Field and Laboratory Reference Document. EPA 600/3-89/013. March 1989;

EcoUpdate: Intermittent Bulletins, Supplemental Guidance to RAGS, Vol. II. EPA Publications 9345.0-051. The contractor shall perform the following tasks which will result in technical analysis, findings, facts, and options to the COR responsible for human health and ecological risk assessments.

10. Administrative Records Support

The contractor shall compile information for inclusion in the EPA Administrative Record as defined in Section 113(k) of CERCLA. An Administrative Record includes: the records, data, and guidance that EPA used to determine the federal response action. The contractor shall compile and maintain the EPA Administrative Record to include:

- ◆ assemble the EPA-provided records
- ◆ organize, maintain, and duplicate materials (for example, microfiche, microfilm, optical disk or other photo or electronic reproduction)
- ◆ compile documents for the administrative record

- ◆ publicize location of the repository in local newspapers
- ◆ coordinate records compilation with state offices and federal facilities
- ◆ organize and compile records for enforcement cases

11. Site Assessment Records Center

The contractor shall provide, maintain and operate a secure Records Center for the EPA site assessment files and library materials.

The contractor shall:

- a. Receive and process access requests from EPA and operation and management of a site assessment records center.
- b. Communicate with requestors to clarify requests
- c. Provide copying support at the records center within the terms of the contract
- d. Update and maintain the file inventory database
- e. parameters Contractor shall adhere to government guidelines for copying support.
- f. Inform the EPA Task Monitor of each third party request and verify if the requested information can be released to the requestor.
- g. Provide delivery/shipping/courier support for requested information
- h. Recycle files based on EPA provided criteria
- i. Ensure that the site assessment records (files and library materials) are secured and safe. Access to files shall be restricted only to individuals and organizations approved by the COR or the Contracting Officer.

F. DATA MANAGEMENT SUPPORT

The contractor shall:

1. provide information technology analysis and options
2. provide information technology support, for example web page support
3. provide data input/output services

G. TRAINING

The contractor shall develop and provide training to federal, state, and local response organizations related to the activities described in this statement of work. Training formats shall include:

1. classroom training
2. exercises
3. field training
4. response practice drills and simulations

H. QUALITY ASSURANCE REQUIREMENTS

When performing work under this SOW, the contractor shall adhere to the following Quality Assurance references and to all requirements/guidance documents incorporated by reference therein.

ANSI/ASQC E4-1994, Specifications and Guidelines for Quality Systems for Environmental Data Collection and Environmental Technology Programs.

EPA QA/R-2, EPA Requirements for Quality Management Plans, External Review Draft Final, October 1998.

EPA QA/R-5, EPA Requirements for Quality Assurance Project Plans for Environmental Data Operations, External Review Draft Final, October 1998. Region I, EPA New England Compendium of Quality Assurance Project Plan Guidance, Draft Final, September 1998.

Region I, EPA New England Compendium of Quality Assurance Project Plan Guidance, Draft Final, September 1998.

Region I, EPA-New England Data Validation Functional Guidelines for Evaluating Environmental Analysis July 1996, Revised December 1996.